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April 10, 2023

Hon. J. Paul Oetken  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Nunez et al.**  
**22-CR-293 (JPO)**

Dear Judge Oetken:

I am the assigned counsel for **Yorkis Chevalier**, a defendant in the above-captioned case. I write today to request a modification to Mr. Chevalier's bail conditions, namely changing the condition that he work in the same building as his residence to a condition that he "obtain/maintain verifiable employment."

Mr. Chevalier was arrested on August 24, 2022, and was released on a \$75,000 bond signed by three financially responsible persons with home detention location monitoring and travel restricted to the Southern and Eastern Districts of New York.

On October 13, 2022, Pretrial Services allowed Mr. Chevalier to work as a handyman helper to his father-in-law at the apartment building where he resides. In November 2022, December 2022, and January 2023, the Court granted modifications to Mr. Chevalier's terms of release for family and holiday celebrations. On February 15, 2023, the Court granted a modification of Mr. Chevalier's home detention to a curfew, which permitted Mr. Chevalier flexibility in seeking higher paying employment.

Mr. Chevalier has now succeeded in that endeavor. He has been offered a union job as a porter at a residential building in Brooklyn. Pretrial Services confirms that the position is “verifiable.” Pretrial Services also informs us that the condition of his bond that he work in his own building as a handyman helper to his father-in-law should be modified to a condition that he “obtain/maintain verifiable employment” in order for him to accept this new position.

Pretrial Services does not object to this request, and the Government takes no position. I therefore respectfully ask the Court to modify Mr. Chevalier’s conditions of release by changing the condition that he work in his own building as a handyman helper to his father-in-law to a condition that he “obtain/maintain verifiable employment.”

Thank you for your consideration of this modification request and for continued courtesies to counsel.

Respectfully submitted,

/s/  
Richard H. Rosenberg, Esq.

Cc: All counsel (by ECF)

Granted.  
So ordered.  
4/10/2023

  
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J. PAUL OETKEN  
United States District Judge